

Response to Debtors' Objection & Motion to Accept Late Filing

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US BANKRUPTCY COURT
DISTRICT OF DELAWARE

*UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE*

In re: FTX Trading Ltd., et al.,
Debtors.
Case No. 22-11068 (JTD)
Jointly Administered

MOTION TO ACCEPT LATE-FILED RESPONSE & RESPONSE TO DEBTORS' OBJECTION TO CLAIM NO. 95643

Submitted by:
Lee Tarone Embury on behalf of
Envoy aka VOY (Lando Tech OU)

Dear Judge Dorsey and Counsel:

I, Lee Tarone Embury, respectfully file this Response and Motion for Leave to File Late, contesting the Debtors' Objection to Claim No. 95643, originally filed on behalf of Envoy aka VOY (Lando Tech OU). This claim reflects amounts owed under a formal agreement with Quoine Pte Ltd. (Liquid Global) for services rendered.

Unfortunately, due to a lack of timely notification and information being sent to our team, I was unaware of the original objection and deadline. I respectfully request that the Court accept this late-filed response based on excusable neglect under Rule 9006(b)(1) of the Federal Rules of Bankruptcy Procedure.

(a) Caption

Court: U.S. Bankruptcy Court for the District of Delaware
Debtors: FTX Trading Ltd., et al.
Lead Case Number: 22-11068 (JTD)
Objection Title: Debtors' Eleventh Omnibus Objection to Claims (No Liability Claims) –
Docket No. 27190

(b) Claimant Details

Name of Claimant: Envoy aka VOY (Lando Tech OU)
Claim Number: 95643

Date: May 22, 2025

SETTLEMENT AGREEMENT

THIS SETTLEMENT AGREEMENT is made this 30 day of october 2022 (the "**Agreement**")

BETWEEN:

1. **QUOINE PTE. LTD.** (UEN: 201414068E), a company incorporated in Singapore and having its registered office at 11 Irving Place, #09-01, Singapore 369551 ("**Quoine**"); and
 2. **LANDO TECH OU**, (Reg No: 16060286) a company incorporated in Estonia ("**Sponsor**"),
- (collectively the "**Parties**" and each a "**Party**").

WHEREAS :-

- (A) Quoine and the Sponsor had entered into a Liquid Listing Agreement dated 30 September 2020 (the "**Listing Agreement**") for the purpose of achieving various aims and objectives relating to the listing on Quoine's digital asset exchange platform, Liquid ("**Liquid**"), of Sponsor's Envoy (NVOY) digital asset (the "**Asset**" or "**Assets**"). In relation to the listing of the Assets on Liquid, Quoine and the Sponsor had also entered into a Token Services Agreement (Quick Exchange and Warm Wallet) dated 1 March 2021 (the "**Token Services Agreement**") for Quoine to enable and make available certain services for the Assets to users on Liquid.
- (B) In accordance with Article 9.2 of the Listing Agreement, Quoine had on 29 September 2022 served a notice to terminate the Listing Agreement on the Sponsor. In accordance with clause 3 of the Token Services Agreement, Quoine had on 29 September 2022 also served a notice to terminate all services provided under the Token Services Agreement.
- (C) The Parties are desirous of settling the various disputes arising out of termination of the Listing Agreement and/or the Token Services Agreement on the terms and subject to the conditions set out herein.

IT IS HEREBY AGREED as follows:

1. Compensation Payment

- 1.1 Quoine shall pay the following amount to the Sponsor within 7 days from the date of this Agreement:

USD 25,000 (the "**Settlement Sum**").

- 1.2 The Settlement Sum may be paid by Quoine in USD Coin (USDC) or Tether (USDT) as follows:

Currency	Reference Rate	Wallet Address
USDC	1:1 with USD	[Sponsor to insert wallet address]
USDT	1:1 with USD	0xf8c0f0c78550cf48c1d91db3516a1963a82ccee8

- 1.3 Notwithstanding anything in this Agreement, all amounts payable by Quoine to the Sponsor shall be subject to any deductions or withholdings which Quoine may be entitled or required to make under applicable laws. Sponsor shall be responsible for any tax that Sponsor or Quoine may be required to collect or pay now or at any time in the future with respect to the Settlement Sum.

2. Full and final settlement; No admission of liability

- 2.1 The payment of the Settlement Sum shall be in full and final settlement of any and all claims, damages, losses, expenses, costs, disbursements and other liabilities which may occur against or be suffered by the Sponsor relating to this Agreement and/or the Listing Agreement and the Token Services Agreement or its relationship with Quoine and its products and services and Quoine shall not be liable whatsoever to the Sponsor for any payments, claims or damages whatsoever arising thereunder.
- 2.2 This Agreement shall not constitute any admission of liability whatsoever by Quoine and is entered into without prejudice to the rights of Quoine.
- 2.3 Notwithstanding any provision to the contrary herein, the Parties shall be entitled to rely on the terms and conditions of this Agreement to prove the existence of a settlement (including its terms and conditions) by the Parties in respect of payment of the Settlement Sum.

3. Termination of the Listing Agreement and Token Services Agreement and the listing of the Assets

- 3.1 The Sponsor agrees and acknowledges that save for Article 4 (Handling of Confidential Information) of the Listing Agreement, which shall continue in full force and effect,] the Listing Agreement shall be deemed to be null and void and of no effect whatsoever with effect on and from 29 October 2022 and each of the Parties shall cease to have any of the rights conferred on it or him under the Listing Agreement and shall be released and discharged from all its obligations thereunder with effect therefrom (including any refund of any fees paid by the Sponsor thereunder (if applicable)).
- 3.2 The Sponsor agrees and acknowledges that the Assets shall be delisted from Liquid on 29 October 2022.
- 3.3 For the avoidance of doubt, notwithstanding anything else in this Agreement or in the Listing Agreement, Quoine reserves the right to delist the Assets from Liquid at any time without notice to the Sponsor if any of the follow events occur:
- a. Quoine determines in its sole discretion that Liquid is to be decommissioned;
 - b. Sponsor is found by Quoine to be in breach of this Agreement or of the Liquid Terms of Use;
 - c. the Monetary Authority of Singapore, a competent court, or any other applicable governmental authority in Singapore declares that the Assets constitute a security or similarly regulated capital markets product ("**Regulated Financial Product**") under applicable laws or regulations;

- d. Quoine has reasonable grounds to believe that the Assets are likely to constitute (i) a Regulated Financial Product; or (ii) other high-risk products pursuant to assessments made under or pursuant to applicable laws and regulations;
 - e. Quoine has reasonable grounds to believe that the continuation of the listing of the Assets constitutes, or would constitute, a violation of any existing or future law or regulation or regulatory framework which Quoine, Sponsor would be subject to; or
 - f. events or circumstances arise at any time while the Assets are listed on Liquid for secondary trading which raise reputational issues for either party, create negative sentiment among trades of the Assets, or which Quoine determines, in its sole discretion, suggest that it is no longer in Quoine's commercial or reputational interests to continue to list the Assets on Liquid.
- 3.4 The Sponsor agrees and acknowledges that Quoine makes no representation or warranty that it will nor does it undertake to, introduce the Sponsor to any of its related corporations (collectively, the **"FTX Group"**) or cause the Assets to be listed on any FTX platform.
- 3.5 The Sponsor agrees and acknowledges that the Token Services Agreement shall be deemed to be null and void and of no effect whatsoever with effect on and from 3 October 2022 and each of the Parties shall cease to have any of the rights conferred on it or him under the Tokens Services Agreement and shall be released and discharged from all its obligations thereunder with effect therefrom. The Sponsor further agrees to the termination of Quick Exchange support for the Assets with effect from 29 September 2022.

4. Sponsor's Undertakings

- 4.1 In consideration of Quoine's payment of the Settlement Sum, the Sponsor agrees, undertakes and covenants the following:
- 4.1.1 to hereby fully waive all rights, benefits, interests in any claims, demands, actions, judgments, proceedings and costs and expenses (including legal costs) it may have against Quoine and/or the FTX Group, clients of Quoine or the FTX Group (the **"Clients"**), past or current or future shareholders, agents, representatives, officers and employees of Quoine or the FTX Group (collectively, the **"Representatives"**), arising in tort, negligence, strict liability or otherwise, directly or indirectly, out of or relating to this Agreement and/or the Listing Agreement and the Token Services Agreement or its relationship with Quoine and its products and services;
 - 4.1.2 not make and shall not permit or cause to be made any further demand and/or file a suit or legal action or arbitration proceedings or any other proceedings whatsoever whether in Singapore or elsewhere against Quoine and/or (where applicable) the FTX Group, the Clients or Representatives in respect of the Listing Agreement and the Token Services Agreement or its relationship with Quoine and its products and services or any or all claims, damages, losses, expenses, costs, disbursements and other liabilities which may occur against or be suffered by the Sponsor in connection with the Listing Agreement and the Token Services Agreement or its relationship with Quoine and its products and services;
 - 4.1.3 keep strictly confidential and shall not, except as prior authorized by Quoine in writing, reveal to any person:-

- a. the terms and conditions of this Agreement and shall not divulge, disseminate, reveal or disclose to any person, entity, organisation or body whether in Singapore or elsewhere, any particulars, information or details in respect of, arising out of or in connection with this Agreement or the settlement herein or the Listing Agreement;
- b. any information (whether transmitted orally, in writing, electronically or in other form) of which it has including without limitation, trade secrets or confidential operations, processes or inventions carried on or used by Quoine or the FTX Group, information concerning the business, affairs, operations, assets and organisation, dealings, clients, customers, principals, suppliers, product research and development, pricing lists, consultants, officers and financial information of Quoine or the FTX Group, including without limitation, the technology, data, processes, designs, ideas, product research and development, market studies and surveys, concepts, plans, costings, designs, contracts and agreements with third parties, advertising and promotional materials, sales publications, documentation, manuals, budgets, financial statements, tax information, accounts, suppliers' lists, customer lists, drawings, notes, memoranda concerning or relating to any of the above and shall not use or attempt to use any such information in any manner which may be likely to injure or cause loss either directly or indirectly to Quoine or the FTX Group or their business. This restriction shall continue without limit in point of time but shall cease to apply to information or knowledge which may come into the public domain otherwise than as a result of a breach of this clause.

4.1.4 not to make or cause to be made public statements or communications that disparage, whether directly or indirectly:

- a. Quoine and the FTX Group;
- b. the business, services, products of Quoine and the FTX Group;
- c. the Clients; and
- d. the past, current or future shareholders, agents, representatives, officers and employees of Quoine and the FTX Group (in their capacity as such).

4.2 The obligations in clause 4.1.4 include oral or written statements made by or caused to be published in any forum or through any medium, including every electronic and/or social media but nothing in clause 4.1.4 shall prohibit the Sponsor from making such statements when required to do so by any applicable law.

5 Sponsor's representations and warranties

The Sponsor represents and warrants that as of the date of this Agreement and until the date the Settlement Sum is paid by Quoine neither it nor anyone acting on its behalf has filed/issued a suit or legal action or arbitration proceedings or any other proceedings whatsoever against Quoine or the FTX Group or the Clients or Representatives in any court and/or tribunal of competent jurisdiction in Singapore or in any other forum in respect of any claim in connection with the Listing Agreement and the Token Services Agreement or their

termination thereof or its relationship with Quoine and its products and services, and will not issue any such legal proceedings in the future.

6. Costs

Each Party shall bear all costs and expenses (legal or otherwise) incurred by it in connection with and/or arising out of this Agreement.

7. Giving effect to the Agreement

Parties must do all such acts and things (including the execution of any document) that may be reasonably required to give full effect to this Agreement.

8. Variations

No variation of this Agreement shall be valid unless it is in writing and signed by or on behalf of each of the Parties to this Agreement.

9. Binding on successors

This Agreement shall be binding upon and inure to the benefit of the Parties, their legal representatives and successors (by purchase, assignment, foreclosure, or whatever means).

10. No assignment

No Party shall assign or transfer any of its rights under this Agreement without the prior written consent of all the Parties.

11. Severance

If any term or provision in this Agreement is held to be illegal or unenforceable, in whole or in part, under any enactment or rule of law, such term or provision or part shall to that extent be deemed not to form part of this Agreement but the enforceability of the remainder of this Agreement shall not be affected.

12. Waiver

No waiver of any breach, or failure to enforce any provision, of this Agreement at any time by either Party shall in any way limit or waive the right of such Party to subsequently enforce and compel strict compliance with the provisions of this Agreement.

13. Counterparts; Electronic signatures

This Agreement may be executed in two or more counterparts, each of which shall be deemed an original and all of which together shall constitute one instrument. Electronic signatures of the parties, whether digital or encrypted, will have the same force and effect as manual signatures. Delivery of a signed counterpart copy of this Agreement by facsimile transmission, by email and PDF attachment, or by any other electronic means will have the same effect as physical delivery of the paper document bearing an original or electronic signature.

14. Third party rights

For the avoidance of doubt, save for any member of the FTX Group, a person or entity who is not a party to this Agreement shall have no right under the Contracts (Rights of Third Parties) Act 2001 to enforce or otherwise rely on any of the terms stated herein.

15. Entire agreement

This Agreement hereby cancels and supersedes all prior representations, arrangements, agreements and understandings between the Parties (if any) relating to the termination of the Listing Agreement and the Token Services Agreement and sets forth the entire agreement and understanding between the Parties relating to the termination of the Listing Agreement and the Token Services Agreement.

16. Governing law

This Agreement shall be governed by and construed in accordance with the laws of Singapore.

17. Jurisdiction

Any dispute, claim, difference or controversy arising out of, relating to, or having any connection with this Agreement (a "**Dispute**"), shall be referred to and finally resolved by arbitration. The arbitration shall be conducted in accordance with the Arbitration Rules of the Singapore International Arbitration Centre (the "**Rules**"). The tribunal shall consist of three arbitrators. The members of the tribunal shall be appointed in accordance with the Rules. The seat, or legal place of arbitration, shall be Singapore. Part II of the International Arbitration Act (Cap. 143A), as amended from time to time, shall apply to any arbitration proceedings commenced under this clause. The language used in the arbitral proceedings shall be English.

[the rest of this page was intentionally left blank]

The Parties have executed this Settlement Agreement as of the date first written above.

Quoine Pte. Ltd.

By:

Name: Seth Melamed

Title: COO & Director

Address for Notices: Marina Bay Financial Centre Tower 1, #11-18, 8 Marina Boulevard, Singapore 018981

Email: seth@liquid.com/ legal_global@liquid.com

Lando Tech OU

By: 

Name: lee tarone

Title: ceo

Address for Notices:

Email: lee@envoydefi.com

lee@VOYFINANCE.COM

lee@VOY.FINANCE



**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: December 12, 2024 at 1:00 P.M. ET
Objection Deadline: December 6, 2024 at 4:00 P.M. ET

**DEBTORS' ONE HUNDRED TWENTY-SEVENTH (SUBSTANTIVE)
OMNIBUS OBJECTION TO CERTAIN
NO LIABILITY PROOFS OF CLAIM (CUSTOMER CLAIMS)**

THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN CLAIMS. CLAIMANTS RECEIVING THIS OBJECTION SHOULD CAREFULLY REVIEW THIS OBJECTION AND LOCATE THEIR NAMES AND CLAIMS ON SCHEDULE 1 AND SCHEDULE 2 OF EXHIBIT A ATTACHED TO THIS OBJECTION AND, IF APPLICABLE, FILE A RESPONSE BY THE RESPONSE DEADLINE FOLLOWING THE INSTRUCTIONS SET FORTH HEREIN.

FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) hereby submit this one hundred twenty-seventh omnibus claims objection (this “Objection”) for entry of an order, substantially in the form attached hereto as Exhibit A (the “Order”), pursuant to sections 105(a) and 502(b) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”), rule 3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and rule 3007-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

Delaware (the “Local Rules”), disallowing and expunging in its entirety each claim set forth in Schedule 1 and Schedule 2 attached to the Order. In support of this Objection, the Debtors submit the *Declaration of Rob Esposito in support of Debtors’ One Hundred Twenty-Seventh (Substantive) Omnibus Objection to Certain No Liability Claims (Customer Claims)* (the “Esposito Declaration”), attached hereto as Exhibit B. In further support of this Objection, the Debtors respectfully state as follows:

Background

1. On November 11 and November 14, 2022 (as applicable, the “Petition Date”), the Debtors filed with the Court voluntary petitions for relief under the Bankruptcy Code. The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. Joint administration of the Debtors’ cases (the “Chapter 11 Cases”) was authorized by the Court by entry of an order on November 22, 2022 [D.I. 128]. On December 15, 2022, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed an Official Committee of Unsecured Creditors (the “Committee”) pursuant to section 1102 of the Bankruptcy Code [D.I. 231].

2. Additional factual background relating to the Debtors’ businesses and the commencement of these Chapter 11 Cases is set forth in the *Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings* [D.I. 24], the *Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings* [D.I. 57], the

Supplemental Declaration of John J. Ray III in Support of First Day Pleadings [D.I. 92] and the *Supplemental Declaration of Edgar W. Mosley II in Support of First Day Pleadings* [D.I. 93].

Facts Specific to the Relief Requested

3. On June 28, 2023, the Court entered the *Order (I)(A) Establishing Deadlines for Filing Customer Proofs of Claim, (B) Approving Procedures for Submitting Proofs of Claim and (C) Approving the Form and Manner of Notice Thereof and (II) Granting Related Relief* [D.I. 1793] (the “Customer Bar Date Order”). The Customer Bar Date Order established, among other things, the deadline of September 29, 2023 to file Customer Claims² against the Debtors.

4. To date, approximately 94,300 customer proofs of claim have been filed against the Debtors, asserting more than \$49,459,000,000.³

No Liability Claims

5. The Debtors and their advisors are reviewing and reconciling all proofs of claim and any related supporting documentation filed against the Debtors. The Debtors have determined, based on their books and records, that the Debtors do not have any liability with respect to each proof of claim listed on Schedule 1 and Schedule 2 to Exhibit A

² “Customer Claims” means a claim (as defined in section 101(5) of the Bankruptcy Code) of any kind or nature whatsoever (whether arising in law or equity, contract or tort, under the Bankruptcy Code, or federal or state law, rule or regulation, common law or otherwise) held by any person (as defined in section 101(41) of the Bankruptcy Code) or entity (as defined in section 101(15) of the Bankruptcy Code) against any of the Debtors, in each case, arising out of or related to (a) any cash, cryptocurrency, digital assets or other assets held by such person or entity in an account on any FTX exchange as of the Petition Date or (b) any other investment or trading activities on any FTX exchange.

³ Excludes 480 frivolous customer claims filed in aggregate for more than \$1.187 sextillion.

(the “No Liability Claims”). Accordingly, the Debtors submit that the No Liability Claims should be disallowed and expunged in their entirety.

Jurisdiction and Venue

6. The Court has jurisdiction to consider this Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief requested herein are sections 105(a) and 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007 and Local Rule 3007-1. Pursuant to Local Rule 9013-1(f), the Debtors consent to the entry of a final order or judgment by the Court in connection with this Objection to the extent it is later determined that the Court, absent the consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Basis for Relief

7. Section 502(a) of the Bankruptcy Code provides, in pertinent part, as follows: “[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). Once an objection to a claim is filed, the Court, after notice and hearing, shall determine the allowed amount of the claim. 11 U.S.C. § 502(b). Section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that it “is unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b).

8. Further, Local Rule 3007-1(d) provides that a debtor may object on a Substantive basis to a “claim that does not have a basis in the debtor’s books and records and does not include or attach sufficient information or documentation to constitute *prima facie* evidence of the validity and amount of the claim, as contemplated by [Bankruptcy Rule] 3001(f)” Local Rule 3007-1(d)(vi); *see also In re Exide Technologies*, 2014 WL 6081302, at *1 (Bankr. D. Del. Oct. 14, 2014) (expunging and disallowing insufficient documentation claims); *In re FBI Wind Down, Inc.*, 2015 WL 1181890, at *1 (Bankr. D. Del. Mar. 3, 2015) (same).

9. While a properly filed proof of claim is *prima facie* evidence of the claim’s allowed amount, when an objecting party presents evidence to rebut a claim’s *prima facie* validity, the claimant bears the burden of proving the claim’s validity by a preponderance of evidence. *See In re Allegheny Int’l, Inc.*, 954 F.2d 167, 173-74 (3d Cir. 1992) (“Initially, the claimant must allege facts sufficient to support the claim. If the averments in his filed claim meet this standard of sufficiency, it is ‘*prima facie*’ valid.”). The burden of persuasion with respect to the claim is always on the claimant, *id.* at 174, and the failure to allege facts and to provide adequate support for a claim eliminates the claim’s *prima facie* validity. *See, e.g., In re Jorczak*, 314 B.R. 474, 481-82 (Bankr. D. Conn. 2004) (discussing the evidentiary requirements and burden of proof with respect to the allowance of claims).

10. As set forth in the Esposito Declaration, based upon a review of the No Liability Claims, the Debtors’ books and records, and the claims register, the Debtors have

identified that the No Liability Claims lack the requisite supporting documentation to verify the existence of any claim against the Debtors. While certain No Liability Claims include documentation, the attached documentation bears no discernable relationship to, or support for, the liability asserted in the underlying claim. Other No Liability Claims attach no supporting documentation at all. In addition, it appears that certain claimants had an FTX account, those accounts had no fiat, cryptocurrency or non-fungible tokens. Moreover, certain other no liability claims were asserted against an FTX debtor but the liability rests with the non-debtor entities FTX Japan K.K. or FTX Turkey Teknoloji ve Ticaret Anonim Sirketi. Thus, the Debtors have determined that the No Liability Claims, with the current attached documentation and FTX account balances, which reflect no fiat, cryptocurrency or non-fungible tokens, are insufficient to verify the existence or amount of the underlying claims as they relate to the Debtors. As such, the No Liability Claims are not *prima facie* valid.

11. Pursuant to Bankruptcy Rule 3001(c), a claimant that files a proof of claim based on a writing must file an original or duplicate of the writing with the proof of claim or otherwise explain that the writing has been lost or destroyed. Only a proof of claim filed in accordance with Bankruptcy Rule 3001(c) constitutes *prima facie* evidence of its validity or amount. See *In re Olympus Healthcare Grp., Inc.*, 2004 WL 144240, at *3 (Bankr. D. Del. Jan. 23, 2004) (finding that the claimant failed to prove its claim by not attaching the guaranty to the proof of claim and did not produce it (or a copy of it) at the hearing on the objection to that claim).

12. Accordingly, the Debtors submit that the No Liability Claims should be disallowed and expunged in their entirety from the claims register.

Responses to This Objection

13. To contest the Debtors' determinations of the No Liability Claims included in this Objection, a claimant must file and serve a written response to this Objection (a "Response") so that it is received no later than December 6, 2024 at 4:00 p.m. (ET) (the "Response Deadline"). Each Response to this Objection must be filed with the Office of the Clerk of the United States Bankruptcy Court for the District of Delaware: 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon counsel to the Debtors, (a) Sullivan & Cromwell LLP, 125 Broad Street, New York, New York 10004, Attn: Christian P. Jensen (jensenc@sullcrom.com) and David M. Rosenthal (rosenthald@sullcrom.com) and (b) Landis Rath & Cobb LLP, 919 Market Street, Suite 1800, Wilmington, Delaware 19801, Attn: Matthew R. Pierce (pierce@lrclaw.com) and Kimberly A. Brown (brown@lrclaw.com), so as to be actually received by no later than the Response Deadline.

14. Each Response to this Objection must, at a minimum, contain the following information:

- (a) a caption setting forth the name of the Court, the name of the Debtors, the lead case number, and the title of the Objection to which the Response is directed;
- (b) the name of the claimant, the claim number, and a description of the basis for the amount of the claim;
- (c) the specific factual basis and supporting legal argument upon which the party will rely in opposing this Objection;

- (d) all documentation and other evidence, to the extent it was not included with the proof of claim previously filed, upon which the claimant will rely to support the basis for and amounts asserted in the proof of claim and in opposing this Objection; and
- (e) the name, address, telephone number, fax number or email address of the person(s) (which may be the claimant or the claimant's legal representative) with whom counsel for the Debtors should communicate with respect to the claim or the Objection and who possesses authority to reconcile, settle, or otherwise resolve the objection to the No Liability Claim on behalf of the claimant.

15. If a claimant fails to timely file and serve a Response by the Response Deadline, the Debtors will present to the Court the Order disallowing and expunging in their entirety the No Liability Claims without further notice to the claimant or a hearing.

16. The Debtors may file and serve a reply to any Response in accordance with the Local Rules. The Debtors reserve the right to seek an adjournment of the hearing on any Response to this Objection, which adjournment will be noted on the notice of agenda for the hearing.

Reservation of Rights

17. Nothing in this Objection: (a) is intended or shall be deemed to constitute an assumption of any agreement pursuant to section 365 of the Bankruptcy Code or an admission as to the validity of any claim against the Debtors or their estates; (b) shall impair, prejudice, waive, or otherwise affect the rights of the Debtors or their estates to contest the validity, priority, or amount of any claim against the Debtors or their estates; (c) shall impair, prejudice, waive, or otherwise affect the rights of the Debtors or their estates with respect to any and all claims or causes of action against any third party; or (d) shall be construed as a promise to pay a

claim or continue any applicable program post-petition, which decision shall be in the discretion of the Debtors. Any payment made pursuant to an order of the Court granting the relief requested herein is not intended to be nor should it be construed as an admission as to the validity of any claim or a waiver of the Debtors' rights to subsequently dispute such claim.

18. The Debtors retain their rights to later object on any basis to any No Liability Claim as to which the Court does not grant the relief requested herein.

Separate Contested Matters

19. To the extent a Response is filed regarding any claim listed in this Objection and the Debtors are unable to resolve the Response, the objection by the Debtors to such claim shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. Any order entered by the Court regarding an objection asserted in this Objection shall be deemed a separate order with respect to each claim subject thereto.

Compliance with Local Rule 3007-1

20. To the best of the Debtors' knowledge and belief, this Objection and the related exhibits comply with Local Rule 3007-1. To the extent this Objection does not comply in all respects with the requirements of Local Rule 3007-1, the undersigned believes such deviations are not material and respectfully requests that any such requirement be waived.

Notice

21. Notice of this Objection has been provided to: (a) the U.S. Trustee; (b) counsel to the Committee; (c) the Securities and Exchange Commission; (d) the Internal Revenue Service; (e) the United States Department of Justice; (f) the United States Attorney for

the District of Delaware; (g) counsel for the Ad Hoc Committee; (h) each claimant whose claim is subject to this Objection; and (i) to the extent not listed herein, those parties requesting notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be provided.

No Prior Request

22. No prior request for the relief sought herein has been made by the Debtors to this or any other court.

Conclusion

WHEREFORE, for the reasons set forth herein, the Debtors respectfully request that the Court (a) enter the Order, substantially in the form attached hereto as Exhibit A, and (b) grant such other and further relief as is just and proper.

Dated: October 23, 2024
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
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-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
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Counsel for the Debtors and Debtors-in-Possession

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: December 12, 2024 at 1:00 P.M. (ET)

Objection Deadline: December 6, 2024 at 4:00 P.M. (ET)

NOTICE OF OBJECTION

TO: (a) the U.S. Trustee; (b) counsel to the Committee; (c) the Securities and Exchange Commission; (d) the Internal Revenue Service; (e) the United States Department of Justice; (f) the United States Attorney for the District of Delaware; (g) counsel for the Ad Hoc Committee; (h) each claimant whose claim is subject to this Objection; and (i) to the extent not listed herein, those parties requesting notice pursuant to Bankruptcy Rule 2002.

On October 23, 2024, FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”) filed the *Debtors’ One Hundred Twenty-Seventh (Substantive) Omnibus Objection to Certain No Liability Proofs of Claim (Customer Claims)* (the “Objection”).

Responses, if any, to the relief requested in the Objection must be filed with the United States Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **December 6, 2024 at 4:00 P.M. (ET)**.

At the same time, you must also serve a copy of the response upon the undersigned counsel so as to be **received no later than 4:00 P.M. (ET) on December 6, 2024**.

A HEARING ON THE OBJECTION WILL BE HELD ON **DECEMBER 12, 2024 AT 1:00 P.M. (ET)** BEFORE THE HONORABLE JOHN T. DORSEY, CHIEF UNITED STATES BANKRUPTCY COURT JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 5TH FLOOR, COURTROOM 5, WILMINGTON, DELAWARE 19801.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: October 23, 2024
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

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Kimberly A. Brown (No. 5138)
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-and-

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Counsel for the Debtors and Debtors-in-Possession

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. __

**ORDER SUSTAINING DEBTORS' ONE HUNDRED TWENTY-SEVENTH
(SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN NO LIABILITY
PROOFS OF CLAIM (CUSTOMER CLAIMS)**

Upon the one hundred twenty-seventh omnibus objection (the "Objection")² of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the "Debtors") for entry of an order (this "Order") sustaining the Objection and disallowing and expunging in their entirety the No Liability Claims set forth in Schedule 1 and Schedule 2 attached hereto, and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each No Liability Claim set forth in Schedule 1 and Schedule 2 attached hereto is disallowed and expunged in its entirety.
3. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any No Liability Claim referenced or identified in the Objection that is not listed on Schedule 1 and Schedule 2 attached hereto.

4. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors' right to object on any other grounds that the Debtors discover are preserved.

5. To the extent a response is filed regarding any No Liability Claim, each such No Liability Claim, and the Objection as it pertains to such No Liability Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each No Liability Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

6. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtors may have to enforce rights of setoff against the claimants.

8. Nothing in the Objection or this Order, nor any actions or payments made by the Debtors pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other

applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

10. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: _____
Wilmington, Delaware

The Honorable John T. Dorsey
Chief United States Bankruptcy Judge

SCHEDULE 1

No Liability Claims

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FTX Trading Ltd. 22-11068 (JTD)
One Hundred Twenty-Seventh Omnibus Claims Objection
Schedule 1 - No Liability Claims

Asserted Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity
96129	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
94080	Name on file	West Realm Shires Services Inc.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
94151	Name on file	West Realm Shires Services Inc.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
95505	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
7153	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
95248	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
47636	Name on file	FTX Trading Ltd.	CHF FTM MXN STEP USD	 185.00000000000000 1,000.00000000000000 150.00000000000000 1,000.00000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
94965	Name on file	West Realm Shires Services Inc.	USD	208,807.3200000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
80684	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
95507	Name on file	West Realm Shires Services Inc.	POC Other Crypto Assertions: TBD	10,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
90514	Name on file	FTX Trading Ltd.	ARS AUD BRL CAD CHF EUR GBP GHS HKD JPY MXN SGD TRY USD VND XOF ZAR	 50.0000000000000000 150.0000000000000000 50.0000000000000000 125.0000000000000000 500.0000000000000000 500.0000000000000000 750.0000000000000000 25.0000000000000000 30.0000000000000000 50.0000000000000000 50.0000000000000000 100.0000000000000000 50.0000000000000000 1,000.0000000000000000 25.0000000000000000 20.0000000000000000 50.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
10705	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
90527	Name on file	FTX Trading Ltd.	AKRO POC Other Ticker Assertions: BOBA NETWORK SOL POC Other Ticker Assertions: STAR ATLAS ATLAS	 1.0000000000000000 9.8212000000000000 0.9384479000000000 1,027.6133000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
30991	Name on file	West Realm Shires Services Inc.	BTC	Undetermined*

Undetermined*: Indicates claim contains unliquidated and/or undetermined amounts

Asserted Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
89222	Name on file	FTX Trading Ltd.	ATLAS	2,324.1755000000000000
			BNB	1.0610000000000000
			CRO	901.5401000000000000
			ETH	0.1167987000000000
			GALA	876.3770000000000000
			MANA	7.0870000000000000
			TRX	426.4064000000000000
			XRP	255.1512000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
1353	Name on file	FTX Trading Ltd.	USD	4,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
48383	Name on file	West Realm Shires Services Inc.	USD	4,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
69569	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
83094	Name on file	FTX Trading Ltd.	USD	7,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
95224	Name on file	West Realm Shires Services Inc.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
92122	Name on file	FTX Trading Ltd.	BTC	0.000006007347895
			FTT	0.0833333333300000
			LTC	0.000000005787443
			USD	222.6587490000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
92132	Name on file	FTX Trading Ltd.	BCH	0.005211109999578
			USD	95.00544809622400
			USDT	15.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96851	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
34872	Name on file	FTX EU Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
91490	Name on file	West Realm Shires Services Inc.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
90063	Name on file	FTX Trading Ltd.	BNB	1.0000000000000000
			BTC	
			DOGE	
			BULL	
			DOT	50.0000000000000000
			FTT	3.0000000000000000
			LINK	1.0000000000000000
			SAND	
			SHIB	
			SOL	100.0000000000000000
			POC Other Ticker Assertions: TOKENS	4.0000000000000000
			TONCOIN	
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
92639	Name on file	FTX Trading Ltd.	BTC	0.3753172300000000
			SOL	10.5538000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
34193	Name on file	FTX EU Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
95392	Name on file	FTX Trading Ltd.		Undetermined*

Undetermined* Indicates claim contains unliquidated and/or undetermined amounts

Asserted Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
95838	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
91394	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96830	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
94601	Name on file	FTX EU Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96706	Name on file	FTX Trading Ltd.	BCH DOGE FTT LTC SOL SRM POC Other Ticker Assertions: STABLECOIN USDC USDT	Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
14667	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
94996	Name on file	West Realm Shires Services Inc.	POC Other Ticker Assertions: 303 ETH-DEPOSITED FROM MAIN ACCOUNT (#####, #####) TO GREEN LEAF SUB ACCOUNT POC Other Ticker Assertions: \$496,920-SALE OF ETH IN GREEN LEAF SUB ACCOUNT	Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant. The liability asserted in the claimant's other ticker assertions is reflected in filed claim 44144.				
71920	Name on file	FTX Trading Ltd.	USD	18,282.5500000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
24648	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
19189	Name on file	FTX Trading Ltd.	AAVE ADA AVAX BAT BTC CEL DOT ETH LINK LUNC MANA MATIC XRP	Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
15548	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
73348	Name on file	FTX Trading Ltd.	BULL ETHBULL	2.1832062700000000 1,013.3203685800000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
93928	Name on file	West Realm Shires Services Inc.		Undetermined*

Undetermined* Indicates claim contains unliquidated and/or undetermined amounts

Asserted Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
89183	Name on file	FTX Trading Ltd.	FTT	1,000.0000000000000000
Reason: Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtor have determined that the liability rests with the non-debtor entity FTX Japan K.K. No liability exists on the Debtors' books and records.				
14558	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96835	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
14598	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
10408	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
14488	Name on file	West Realm Shires Services Inc.	USD	600.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
39280	Name on file	FTX Trading Ltd.	BTC-PERP ETH-PERP GRT LINA MATIC-PERP SHIB SLP USD USDT	0.0000000000000000 0.0000000000000000 130.0000000000000000 1,360.0000000000000000 0.0000000000000000 1,100,000.0000000000000000 1,000.0000000000000000 0.152908861885878 0.00000000423282
Reason: Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtor have determined that the liability rests with the non-debtor entity FTX Japan K.K. No liability exists on the Debtors' books and records.				
34424	Name on file	FTX Trading Ltd.	JPY	1,193,300.0000000000000000
Reason: Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtor have determined that the liability rests with the non-debtor entity FTX Japan K.K. No liability exists on the Debtors' books and records.				
15692	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
94519	Name on file	FTX Trading Ltd.	GMT POC Other Ticker Assertions: GREEN SATOSHI TOKEN GST USDT	15.0000000000000000 524.0000000000000000 50.0000000000000000
Reason: Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtor have determined that the liability rests with the non-debtor entity FTX Turkey Teknoloji ve Ticaret Anonim Sirketi. No liability exists on the Debtors' books and records.				
95390	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
95643	Name on file	Quoine Pte Ltd	USD	25,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
14884	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
89174	Name on file	West Realm Shires Services Inc.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
3894	Name on file	FTX Trading Ltd.	USD	947.2900000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
26934	Name on file	West Realm Shires Services Inc.	USD	10,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
91826	Name on file	FTX EU Ltd.	BTC ETH	0.0898126500000000 0.1176341220000000

Undetermined* Indicates claim contains unliquidated and/or undetermined amounts

Asserted Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
91827	Name on file	FTX EU Ltd.	BTC ETH EUR	0.0898126500000000 0.1176341220000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
80082	Name on file	West Realm Shires Services Inc.	USD	25,000.0000000000000000
Reason: Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtor have determined that the liability rests with the non-debtor entity FTX Japan K.K. No liability exists on the Debtors' books and records.				
45314	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
90656	Name on file	West Realm Shires Services Inc.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
91603	Name on file	West Realm Shires Services Inc.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
94966	Name on file	Alameda Research LLC	USD	40,087.5000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
95011	Name on file	Alameda Research Holdings Inc.	USD	40,087.5000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
97167	Name on file	FTX EU Ltd.	USD	40,000,000,000,000,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96132	Name on file	West Realm Shires Services Inc.	USD	500.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
95594	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96789	Name on file	FTX EU Ltd.	BTC LTC POC Other Ticker Assertions: POWER LEDGER	6,904,629.0000000000000000 21,099.0000000000000000 2,118,879.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
4149	Name on file	FTX Europe AG	BTC BUSD FTM FTT LUNA2 LUNA2_LOCKED LUNC SOL USD	0.0843994130000000 564.9304976000000000 0.0842000000000000 256.5000000000000000 23.0000000000000000 54.4482920900000000 2,540,000.0000000000000000 0.0003377190000000 1,060.1600000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
938	Name on file	FTX Trading Ltd.	BTC	0.0138171000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
62143	Name on file	FTX Trading Ltd.	COIN LEO	40.7043575897400000 627.152279559830970
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
87563	Name on file	Quoine Pte Ltd	USD	2,325.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
22237	Name on file	West Realm Shires Services Inc.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
16000	Name on file	FTX Trading Ltd.		Undetermined*

Undetermined* Indicates claim contains unliquidated and/or undetermined amounts

Asserted Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
52489	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
58394	Name on file	West Realm Shires Services Inc.	USD	8,433.0600000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
50952	Name on file	FTX Europe AG	USD	17,043.6500000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
88376	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
88235	Name on file	West Realm Shires Services Inc.	USD	25,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
27039	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
90598	Name on file	West Realm Shires Services Inc.	DOGE	48,639.8142616000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
95749	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
48692	Name on file	FTX Trading Ltd.	BCH BCH-PERP BTC BTC-0331 BTC-PERP DOT-1230 ETH ETH-PERP FTT FTT-PERP JPY SOL-1230 SOL-PERP SRM USD USDT XRP	10.1970000000000000 -10.1970000000000000 1.088419435958850 0.0000000000000000 -1.0236000000000000 0.0000000000000000 0.0000573500000000 0.0000000000000000 100.0123256600000000 -41.9000000000000100 0.588125468452693 0.0000000000000000 0.0000000000000000 0.0100000000000000 24,262.6571411485000000 0.0100000000000000 2.0000000000000000
Reason: Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtor have determined that the liability rests with the non-debtor entity FTX Japan K.K. No liability exists on the Debtors' books and records.				
61582	Name on file	FTX Trading Ltd.	BCH BCH-PERP BTC BTC-0331 BTC-PERP DOT-1230 ETH ETH-PERP FTT FTT-PERP JPY SOL-1230 SOL-PERP SRM USD USDT XRP	10.1970000000000000 -10.1970000000000000 1.088419435958852 0.0000000000000000 -1.0236000000000000 0.0000000000000000 0.0000573500000000 0.0000000000000000 100.0123256600000000 -41.9000000000000100 0.588125468452692 0.0000000000000000 0.0000000000000000 0.0100000000000000 24,262.6571411485020000 0.0100000000000000 2.0000000000000000
Reason: Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtor have determined that the liability rests with the non-debtor entity FTX Japan K.K. No liability exists on the Debtors' books and records.				
68969	Name on file	FTX Trading Ltd.	USD	20,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
86168	Name on file	FTX Trading Ltd.	BNB DOGE ETHW SRM	Undetermined*

Undetermined*: Indicates claim contains unliquidated and/or undetermined amounts

Asserted Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity
			TRX USDC USDT	
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96186	Name on file	West Realm Shires Services Inc.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
86343	Name on file	FTX Trading Ltd.	USD	41.923409270250000
Reason: Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtor have determined that the liability rests with the non-debtor entity FTX Japan K.K. No liability exists on the Debtors' books and records.				
93172	Name on file	FTX EU Ltd.	EUR	55.000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
90544	Name on file	West Realm Shires Services Inc.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96169	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
88799	Name on file	West Realm Shires Services Inc.	AVAX MATIC SOL	2.000000000000000 619.277700000000000 119.924600000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
21060	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
14881	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
93702	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				

SCHEDULE 2

No Liability Claims

FTX Trading Ltd. 22-11068 (JTD)
One Hundred Twenty-Seventh Omnibus Claims Objection
Schedule 2 - No Liability Claims

			Asserted Claims	
Claim Number	Name	Debtor	Tickers	Ticker Quantity
96854	Name on file	FTX Trading Ltd.	APE BCH BNB BTC CEL CRO DOGE ETH FTT TRY USD USDC XOF	700.0000000000000000 1,000.0000000000000000 80.0000000000000000 300.0000000000000000 500.0000000000000000 500.0000000000000000 300.0000000000000000 5,000.0000000000000000 100.0000000000000000 200.0000000000000000 2,500.0000000000000000 7.0000000000000000
Other Activity Asserted: 5000 - Cash				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
40072	Name on file	FTX Trading Ltd.	USD	30.0000000000000000
Other Activity Asserted: 30 USD - FEE VOUCHER ADJUSTMENT				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No liability exists on account of the \$30 USD asserted in the other activity section of the proof of claim form. The \$30 USD was a voucher provided to offset trading fees, however the claimant didn't trade on this account. The \$30 vouchers were removed from the customer entitlements in the Debtors' schedule amendments filed June 27, 2023. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
15213	Name on file	FTX Trading Ltd.		Undetermined*
Other Activity Asserted: None - None				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
15834	Name on file	FTX Trading Ltd.		Undetermined*
Other Activity Asserted: 3000\$ - I Play NFT And Exchange Dollars				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
88156	Name on file	West Realm Shires Services Inc.	USDC	1,000.0000000000000000
Other Activity Asserted: >\$1000 - Undisclosed amount				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
94728	Name on file	FTX Trading Ltd.	USD USDT	5,357.7200000000000000 9,997.2803000000000000
Other Activity Asserted: 15355.0003 - Dear System Administrator: I kindly ask you to review my account again, and provide me with an explanation for the assigned amount. If possible, I'd appreciate a detailed breakdown of the calculations used to arrive at the current claim amount. I originally had a lot of assets on the platform (including Bitcoin (BTC), Metaplex Token (MPLX), Manchester City FC Fan Token (CITY)...etc. on the list above), plus the negative amount has not been automatically corrected by the system (risk preparation gold), and there are additional stored-value USDT assets on the account. My sub-account "#####" was liquidated by the system on November 9, 2022, but the platform system did not display the correct balance, causing my balance to be negative. According to the FTX user terms, the risk fund should automatically replenish the balance to a positive number. I opened a work order on the FTX platform, but I haven't received a reply yet, causing my balance to be incorrect. According to the FTX platform terms: "When an account is approaching automatic liquidation, it will be liquidated at the liquidation price, and the liquidity supply mechanism will take over the position. The remaining margin portion is transferred to the risk reserve. If the account is liquidated, the risk reserve will allocate funds to bring the account balance back to zero." However, at that time, the clearing system did not operate normally, because spot and futures were almost suspended at that time, and the asset price on the website showed a significant difference from that of external coinbase/binance, which proved that the system did not operate normally. On the day "November 8, 2022", I did deposit a total of 9,997.2803 USDT through on-chain stored value, but it was not shown on the account. Currently only USDT 1.38 is shown on the account. In addition, in November 2022, I opened a work order on FTX. The content is that the clearing system cannot display my sub-account balance correctly! According to the user terms of the FTX website, the clearing system guarantees that users' rights will not be affected by delays in the clearing system, and that the risk reserve will allocate funds to restore the account balance to zero by the risk guarantee mechanism (system mechanism). However, the system did not take action at that time, my rights and interests were damaged, and the negative balance affected my subsequent operations, but I have not received a reply from FTX! Thank you so much.				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
89991	Name on file	FTX Trading Ltd.	EUR	800.0000000000000000
Other Activity Asserted: 800€ - I don't have anymore access to all details of my crypto portfolio and my earns, but I want to get back at least my first wire transfer amount				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
22260	Name on file	FTX Trading Ltd.	USD	0.0000000000000000

Undetermined* Indicates claim contains unliquidated and/or undetermined amounts

Asserted Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity
Other Activity Asserted: 30,00USD - FEE VOUCHER ADJUSTMENT				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No liability exists on account of the \$30 USD asserted in the other activity section of the proof of claim form. The \$30 USD was a voucher provided to offset trading fees, however the claimant didn't trade on this account. The \$30 vouchers were removed from the customer entitlements in the Debtors' schedule amendments filed June 27, 2023. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
74908	Name on file	FTX Trading Ltd.	USD	0.000000000000000
Other Activity Asserted: 20\$ - Signup trading bonus				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No liability exists on account of the \$20 USD asserted in the other activity section of the proof of claim form. The trading fee voucher was provided to offset trading fees, however the claimant didn't trade on this account. The vouchers were removed from the customer entitlements in the Debtors' schedule amendments filed June 27, 2023. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
88637	Name on file	FTX Trading Ltd.		Undetermined*
Other Activity Asserted: 0 - I made an inquiry by changing my email				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96669	Name on file	West Realm Shires Services Inc.		Undetermined*
Other Activity Asserted: Total claim 5643.78 - Staked ETH, shibu inu, and maker dao				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
47710	Name on file	Quoine Pte Ltd	JPY	280,510.259510000000000
Other Activity Asserted: None - None				
Reason: Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtor have determined that the liability rests with the non-debtor entity FTX Japan K.K. No liability exists on the Debtors' books and records. No liability exists on account of the other activity asserted.				
38874	Name on file	FTX Trading Ltd.	BTC	1.084117830000000
Other Activity Asserted: More than 21 thousand USDT - I'm confused about the question no 7, someone directed to trade me, so I don't know more about crypto currency's type, but I had FTX account balance more then 21 thousand USDT at 11 th November 2022				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
14988	Name on file	FTX Trading Ltd.		Undetermined*
Other Activity Asserted: nao me recordo perdi com criptomoedas \$60.000,00 - Não me recordo onde investi meu dinheiro, apenas criei uma conta na FTX.COM e comprei criptomoedas, quando soube da noticia da falencia				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
76808	Name on file	FTX Trading Ltd.	USD	0.000000000000000
Other Activity Asserted: 20 - There is FEE VOUCHER ADJUSTMENT in Balance Adjustments - what is it?				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No liability exists on account of the \$20 USD asserted in the other activity section of the proof of claim form. The trading fee voucher was provided to offset trading fees, however the claimant didn't trade on this account. The vouchers were removed from the customer entitlements in the Debtors' schedule amendments filed June 27, 2023. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
78543	Name on file	West Realm Shires Services Inc.	USD	7,283.600000000000000
Other Activity Asserted: 7,283.60 - wire transfer to my account was never deposited IMAD #####				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
54341	Name on file	FTX Trading Ltd.	USD	30.000000000000000
Other Activity Asserted: 30 - IDENTIFIED AS A CUSTOMER WITH A NET POSITIVE ACCOUNT BALANCE AS OF NOVEMBER 11, 2022 OF ONE OR MORE OF THE DEBTORS IN THE CHAPTER 11 CASES OF FTX TRADING LTD.				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No liability exists on account of the \$30 USD asserted in the other activity section of the proof of claim form. The \$30 USD was a voucher provided to offset trading fees, however the claimant didn't trade on this account. The \$30 vouchers were removed from the customer entitlements in the Debtors' schedule amendments filed June 27, 2023. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
95881	Name on file	West Realm Shires Services Inc.		Undetermined*
Other Activity Asserted: \$50,000 - I had a balance of \$50,000 USD with FTX US. On November 8, 2022, I attempted to withdraw 2 separate wires of \$25,000 each. The app still shows the two wires in my withdraw history but the funds never landed at my bank.				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
29945	Name on file	FTX Trading Ltd.	BCH BTC XF	0.000000001933779 0.000000087998340 0.000000004144445

Undetermined* Indicates claim contains unliquidated and/or undetermined amounts

Asserted Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity
Other Activity Asserted: ? - ##### claim				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
88796	Name on file	West Realm Shires Services Inc.	MATIC SOL	309.6077000000000000 59.9623000000000000
Other Activity Asserted: 59.9623 SOL and 309.6077 MATIC / 1.4714 AVAX - I had solana and matic crypto on FTX.US could not transfer to coinbase.				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96278	Name on file	West Realm Shires Services Inc.		Undetermined*
Other Activity Asserted: 20000 - I was a customer of these platforms				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96546	Name on file	FTX Trading Ltd.	BTC CEL ETH SUSHI USD USDC USDT	14,657.0000000000000000 3,200.0000000000000000 6,500.0000000000000000 665.0000000000000000 750.0000000000000000 320.0000000000000000 54.0000000000000000
Other Activity Asserted: 14000 - I believe I lost at minimum somewhere along the lines of at least \$14,000				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
78797	Name on file	FTX Trading Ltd.	SOBTC	0.2148900000000000
Other Activity Asserted: 0.214893 BTC = 5821\$ at the time of writing. - I transferred BTC from FTX to my Solana wallet. But I didn't receive BTC, I received "(Sollet) BTC", which is issued and pegged by FTX to allow BTC to interact with the Solana blockchain. When the FTX saga happened, (Sollet) BTC lost all value and it was impossible for me to sell it anymore. Today instead of my 0.21489 (Sollet) BTC being valued 5821.02\$. It is worth 286\$ at the time of writing this. My claim is to be reimbursed for the (Sollet) BTC that I have in my 3rd party (phantom) wallet.				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
78869	Name on file	FTX Trading Ltd.	BTC	0.2148930000000000
Other Activity Asserted: 5812\$ - I transferred BTC from FTX to my Solana wallet. But I didn't receive BTC, I received "(Sollet) BTC", which is issued and pegged by FTX to allow BTC to interact with the Solana blockchain. When the FTX saga happened, (Sollet) BTC lost all value and it was impossible for me to sell it anymore. Today instead of my 0.21489 (Sollet) BTC being valued 5821.02\$. It is worth 286\$ at the time of writing this. My claim is to be reimbursed for the (Sollet) BTC that I have in my 3rd party (phantom) wallet.				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				

EXHIBIT B

Esposito Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**DECLARATION OF ROB ESPOSITO IN SUPPORT OF DEBTORS' ONE HUNDRED
TWENTY-SEVENTH (SUBSTANTIVE) OMNIBUS OBJECTION TO
CERTAIN NO LIABILITY CLAIMS (CUSTOMER CLAIMS)**

I, Rob Esposito, hereby declare under penalty of perjury:

1. I am a Senior Director at Alvarez & Marsal North America, LLC ("A&M"), a restructuring advisory services firm specializing in interim management, crisis management, turnaround consulting, operational due diligence, creditor advisory services and financial and operation restructuring.
2. I have more than 15 years of restructuring experience across various industries, including broadcasting, oil & gas, manufacturing, pharma, transportation, automotive, retail, telecommunications, and healthcare.
3. Since joining A&M, I have been involved in numerous Chapter 11 restructurings, including Alpha Natural Resources, Sandridge Energy, Westmoreland Coal, Endo

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

International, Cumulus Media, Coach America, Cooper-Standard Automotive, Ascena Retail and Exide Technologies.

4. I submit this declaration (the “Declaration”) in support of the *Debtors’ One Hundred Twenty-Seventh (Substantive) Omnibus Objection to Certain No Liability Claims (Customer Claims)* (the “Objection”).² I am not being compensated separately for this testimony other than through payments received by A&M as financial advisor retained by FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”).

5. Except as otherwise indicated herein, all of the facts set forth in this Declaration are based upon my personal knowledge, my review of relevant documents, information provided to me by the Debtors’ management, the Debtors and other Debtor professionals, including the A&M team, involved in advising the Debtors in the above-captioned case (the “Chapter 11 Case”). If called upon to testify, I could and would testify to the facts set forth herein on that basis. I am authorized to submit this Declaration on behalf of the Debtors.

6. The No Liability Claims subject to the Objection were carefully reviewed and analyzed in good faith using due diligence by appropriate personnel of the Debtors, A&M, and the Claims Agent. Indeed, the Debtors and their advisors have spent months reviewing and analyzing proofs of claim and any supporting documentation filed against the Debtors. These

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

efforts resulted in, among other things, identifying the No Liability Claims set forth in Schedule 1 and Schedule 2 to Exhibit A of the Objection.

7. Based on the Debtors' and their advisors' ongoing analysis and review, the Debtors and their advisors have determined that the No Liability Claims are not reflected in the Debtors' books and records. There are no details on the face of the No Liability Claims that explain the conduct or activity giving rise to a claim against the Debtors, nor that substantiate the amount of the claims asserted. In addition, it appears that certain claimants had an FTX account, however the accounts had no fiat, cryptocurrency or non-fungible tokens. Moreover, certain other no liability claims were asserted against an FTX debtor but the liability rests with the non-debtor entities FTX Japan K.K. or FTX Turkey Teknoloji ve Ticaret Anonim Sirketi. Therefore, I believe that the No Liability Claims should be disallowed and expunged in their entirety.

8. If the No Liability Claims are not disallowed, the affected Claimants may receive an unwarranted recovery from the estate. Further, I believe the administration of these claims would be more efficient and fair to all parties if the Debtors have the ability to expunge and disallow the No Liability Claims in their entirety.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: October 23, 2024

/s/ Rob Esposito

Rob Esposito
Alvarez & Marsal North America, LLC
Senior Director

SERVICE ALERT**EXPRESS
12:00****ATTEMPT
DELIVERY
BEFORE 12:00****EXPRESS 12:00****TDT****DHL**2025-06-04 DCHS 4.0 / *12-1408*
19801 WILMINGTON, UNITED STATES OF AMERICAOrigin:
BKK**US-PHL-NJS DENJ****ADI**

Ref Code: 1057612080TH20250604

Date:
2025-06-04Pce/Shpt Weight
0.34/0.5 KGPlace
1/1Content Description
Annual report (printed matter)

Day

Time
X12

WAYBILL 10 5761 2080

EXPRESS 12:00**TDT****DHL**

2025-06-04 MYDHL+ 1.0 / *30-0821*

From: Coinweb Holding Co., Ltd.
Toby Gilbert
62 The Millennia Tower 17th fl.
No. 1704-5 Langsuan Lumphini Pathumwan10330 BANGKOK
Thailand

Origin:

BKKTo: Office of the Clerk
Office of the Clerk
U.S. Bankruptcy Court
for the District of Delaware
824 Market Street, 3rd Floor
19801 WILMINGTON Delaware
United States of AmericaContact:
Office of the Clerk**US-PHL-NJS DENJ****ADI**

Day

Time

X12

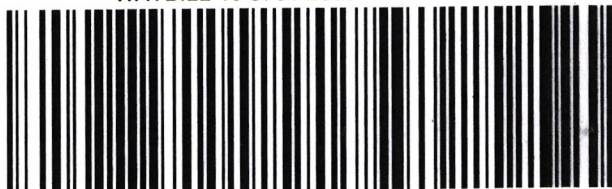
Ref:

Pce/Shpt Weight

Piece

0.5 kg 1 / 1Contents: Annual
reports

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